

**EXHIBIT B**

**Zakarin, Donald S.**

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**From:** Zakarin, Donald S.  
**Sent:** Friday, May 10, 2024 2:41 PM  
**To:** Tyrone Blackburn  
**Cc:** Janowitz, James A.; Charron, William  
**Subject:** RE: Jones v. Combs et. al. 24 Civ. 1457

If the letter motion is filed by Monday, I am sure the Judge will grant it (on our agreement) immediately and moot our motion to dismiss. If, for whatever reason, it is not granted before Wednesday, we will write to the Court to adjourn the motion because you are dismissing the claims.

*Donald S. Zakarin*

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**From:** Tyrone Blackburn <tblackburn@tablackburnlaw.com>  
**Sent:** Friday, May 10, 2024 2:36 PM  
**To:** Zakarin, Donald S. <DZakarin@pryorcashman.com>  
**Cc:** Janowitz, James A. <JJanowitz@pryorcashman.com>; Charron, William <WCharron@pryorcashman.com>  
**Subject:** Re: Jones v. Combs et. al. 24 Civ. 1457

Okay. I file a letter motion. I will have a draft by tomorrow morning for you to review. Will you withdraw your motion to dismiss in light of the letter motion? I think it would make sense to do so, or I will be forced to file my opposition next week.

Regards,

Tyrone A. Blackburn, Esq.  
T. A. Blackburn Law, PLLC.  
Phone: 347-342-7432  
[TABlackburnlaw.com](http://TABlackburnlaw.com)

On May 10, 2024, at 2:33 PM, Zakarin, Donald S. <[DZakarin@pryorcashman.com](mailto:DZakarin@pryorcashman.com)> wrote:

I do not believe a joint motion is appropriate. I believe you should make a motion to dismiss the claims and allegations and we will review it and, hopefully, approve. You file it as your motion and we will then file our agreement to the dismissal with prejudice. You can say in the motion that any mention of any of our clients in the SAC will be deemed to have been stricken (that may obviate any need to further amend).

*Donald S. Zakarin*

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**From:** Tyrone Blackburn <[tblackburn@tablackburnlaw.com](mailto:tblackburn@tablackburnlaw.com)>  
**Sent:** Friday, May 10, 2024 2:29 PM  
**To:** Zakarin, Donald S. <[DZakarin@pryorcashman.com](mailto:DZakarin@pryorcashman.com)>  
**Cc:** Janowitz, James A. <[JJanowitz@pryorcashman.com](mailto:JJanowitz@pryorcashman.com)>; Charron, William <[WCharron@pryorcashman.com](mailto:WCharron@pryorcashman.com)>  
**Subject:** Re: Jones v. Combs et. al. 24 Civ. 1457

I have served the remaining defendants and have agreements with the majority of them to extend their dates to appear. I think it would be easiest to file a joint letter motion to dismiss, which I can draft. It will be on consent that your clients will be dismissed with prejudice, and any mention of them in the second amendment complaint will be stricken? Let me know your thoughts.

Regards,

Tyrone A. Blackburn, Esq.  
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On May 10, 2024, at 2:10 PM, Zakarin, Donald S. <[DZakarin@pryorcashman.com](mailto:DZakarin@pryorcashman.com)> wrote:

I believe that the appropriate way of doing it would be by a short motion to the Court, which you can show us before filing it, and assuming we have no problem with the content of the motion, we will then submit a response indicating our agreement. I do think you may have to submit an amended complaint (or in the motion note you will be amending) to change the caption and to remove the allegations against all of our clients and the claims.

*Donald S. Zakarin*

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**From:** Tyrone Blackburn <[tblackburn@tablackburnlaw.com](mailto:tblackburn@tablackburnlaw.com)>

**Sent:** Friday, May 10, 2024 1:50 PM

**To:** Zakarin, Donald S. <[DZakarin@pryorcashman.com](mailto:DZakarin@pryorcashman.com)>

**Subject:** Re: Jones v. Combs et. al. 24 Civ. 1457

I can send you a document for dismissal. Will this be on consent?

Regards,

Tyrone A. Blackburn, Esq.  
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Phone: 347-342-7432  
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On May 10, 2024, at 1:26 PM, Zakarin, Donald S.  
<[DZakarin@pryorcashman.com](mailto:DZakarin@pryorcashman.com)> wrote:

Mr. Blackburn:

I will refrain from further addressing the license agreement discussion for the reasons outlined yesterday and in our motion papers.

We have made clear to you, since our first communication on March 4, in our subsequent communications, in a motion to dismiss the FAC and a motion to dismiss the SAC, that the allegations and claims in each of the three complaints you have filed against our clients were completely baseless, legally and factually, and that they were knowingly false and, as such, you should dismiss them forthwith.

With our motion to dismiss the SAC now pending, confirming my understanding of your note below, you are now going to unconditionally dismiss all of the claims and allegations in the SAC against all of our clients (UMG Recordings, Inc., incorrectly named in the SAC as Universal Music Group, Motown Records, a division of UMG Recordings, Inc. and Sir Lucian Grainge) with prejudice. I expect that you will undertake whatever is necessary for you to accomplish that result.

On behalf of our clients, all of their rights and remedies are reserved.

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